

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALLEN J. HANSON, *pro se*,
Plaintiff

v.

STATE OF RHODE ISLAND DEPARTMENT
OF CORRECTIONS, *et al.*,
Defendants

C.A. No. 1:17-cv-00598-WES-PAS

STATE'S OBJECTION TO PLAINTIFF'S MOTION TO COMPEL (ECF 71)

NOW COMES the Defendant, State of Rhode Island, Department of Corrections, ("RIDOC" or the "State") and hereby objects to the Motion to Compel, ECF 71, filed by the Plaintiff, Allen J. Hanson ("Hanson" or "Plaintiff"). In support thereof, the State asserts that, it has responded to both sets of Plaintiff's Requests for Production of Documents on November 7, 2019 and December 20, 2019, respectively. Furthermore, the Plaintiff attached a copy of the State's Response to Plaintiff's Second Request for Production of Documents as "Exhibit A" to his Motion to Compel, thereby disproving his own assertion that the State "won't respond." The State's responses indicate that certain responses will be supplemented, if necessary, in accordance with the Federal Rules of Civil Procedure.

WHEREFORE, the State prays that this Honorable Court deny Plaintiff's Motion to Compel, ECF 71.

Respectfully Submitted,

Defendant,
STATE OF RHODE ISLAND,
DEPARTMENT OF CORRECTIONS,
By:

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Justin J. Sullivan

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the within document was filed via the ECF filing system on Tuesday, March 10, 2020 and that it is available for viewing and downloading. I also hereby certify that I mailed a copy of the within document by first class mail, postage prepaid on Tuesday, March 10, 2020 to:

Allen J. Hanson (Inmate ID #129924)
Adult Correctional Institute, Maximum Security
P.O. Box 8273
Cranston, RI 02920

/s/ Justin J. Sullivan